

Keith Ketterling (*pro hac vice*)  
Lydia Anderson-Dana (*pro hac vice*)  
Madeleine Holmes (*pro hac vice*)  
Erin E. Roycroft (*pro hac vice*)  
**STOLL BERNE**  
209 SW Oak Street, Suite 500  
Portland, OR 97204  
Telephone: (503) 227-1600  
Facsimile: (503) 227-6840  
[kketterling@stollberne.com](mailto:kketterling@stollberne.com)  
[landersondana@stollberne.com](mailto:landersondana@stollberne.com)  
[mholmes@stollberne.com](mailto:mholmes@stollberne.com)  
[eroycroft@stollberne.com](mailto:eroycroft@stollberne.com)

9 Kasey J. Curtis (SBN 268173)  
10 Charles P. Hyun (SBN 307817)  
11 Kathryn Bayes (SBN 334864)  
12 Katherine Goetz  
13 kcurtis@reedsmit.com  
14 chyun@reedsmit.com  
15 kbayes@reedsmit.com  
16 kgoetz@reedsmit.com  
**REED SMITH LLP**  
17 355 South Grand Avenue, Suite 2900  
18 Los Angeles, CA 90071  
19 Telephone: (213) 457-8089  
20 Facsimile: (213) 457-8080

17 | Attorneys for Defendant Umpqua Bank

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

21 SHELA CAMENISCH, et al..

CASE NO.: 5:20-cv-05905-PCP

## Plaintiffs,

**DEFENDANT UMPQUA BANK'S  
UNOPPOSED ADMINISTRATIVE  
MOTION TO ALLOW REMOTE  
APPEARANCE AT APRIL 3, 2025  
HEARING**

23 | vs

24 UMPQUA BANK

**Defendant**

Date: April 3, 2025  
Trial Date: April 28, 2025  
Judge: Hon. P. Casey Pitts

1 Pursuant to Civil Local Rule 7-11 and the Court's Standing Order for Civil Cases,  
 2 Defendant Umpqua Bank ("Umpqua") files this administrative motion respectfully requesting  
 3 that its counsel, Kasey J. Curtis of Reed Smith LLP, be permitted to attend the hearing set for  
 4 April 3, 2025 at 10:00 am remotely via Zoom. Plaintiffs do not oppose this request. Declaration  
 5 of Kasey J. Curtis ("Curtis Decl.") ¶ 6.

6 Mr. Curtis has pre-existing travel plans with his family and his three young children, who  
 7 will be on Spring Break from elementary school from March 31, 2025 through April 4, 2025.  
 8 Curtis Decl., ¶ 2. It will therefore be very difficult for Mr. Curtis to travel San Jose to appear in  
 9 person at the hearing. Curtis Decl., ¶¶ 3-4. Mr. Curtis would, however, be available to attend  
 10 the hearing via Zoom. Curtis Decl., ¶ 4.

11 Mr. Curtis' presence at the hearing would be beneficial to Umpqua as he has been  
 12 representing Umpqua in this case since early 2022 and was the principal author of the post-trial  
 13 motions that will be argued at the April 3, 2025 hearing. Curtis Decl., ¶ 5. Umpqua's other  
 14 attorneys, including Umpqua's lead counsel, Keith Ketterling, will attend the hearing in person.  
 15 Curtis Decl., ¶ 5.

16 Based on the foregoing, Umpqua respectfully requests that Mr. Curtis be granted leave  
 17 to attend the April 3, 2025 hearing remotely via Zoom.

18  
 19 DATED: March 14, 2025

20 REED SMITH LLP

21  
 22 By: /s/ Kasey J. Curtis  
 23 Kasey J. Curtis  
 24 Charles P. Hyun  
 25 Kathryn M. Bayes  
 26 Katherin Goetz  
 27 Attorneys for Defendant  
 28 UMPQUA BANK

**DECLARATION OF KASEY J. CURTIS**

I, Kasey J. Curtis, declare under penalty of perjury as follows:

1. I am an attorney with the law firm of Reed Smith LLP, one of the law firms representing Defendant Umpqua Bank (“Umpqua”) in connection with this action. This declaration is based on my personal knowledge and if called to testify to the following facts I could and would competently do so.

7       2. My three kids—who are in first and fourth grades—will be on Spring Break from  
8 March 31, 2025 through April 4, 2025. Prior to the scheduling of the April 3, 2025 hearing, I  
9 made plans with my wife and kids to travel to Catalina Island from April 1, 2025 through April 5,  
10 2025 for my kids' Spring Break. These travel plans included non-refundable, pre-paid ferry tickets  
11 and lodging in Avalon, California. Because I had been focused on the trial, and these plans were  
12 not on my work calendar, I did not remember these travel plans when the Court set the April 3,  
13 2025 hearing at the conclusion of trial.

14       3. It is fairly difficult to get from Catalina Island to San Jose, California. The ferry  
15 crossing from Catalina Island back to Long Beach takes approximately an hour and a half and  
16 runs 4 times a day on weekdays. The ferry also requires that passengers be present at the ferry  
17 terminal approximately a half our before the ferry leaves. From Long Beach, one would have to  
18 travel to the airport and take a flight from either the Long Beach Airport or Los Angeles Airport  
19 to San Jose, California.

20       4.     The entire process would likely take 5-6 hours, each way. Because of the difficulty  
21     in traveling between Catalina Island and San Jose, California, I would likely be unable to attend  
22     the April 3, 2025 hearing in person. I would, however, be able to attend remotely, via Zoom.  
23     Umpqua's other attorneys will attend the hearing in person.

24       5. I have been working on this case since Spring 2022 and am the principal author of  
25 the post-trial motions that are set to argued on April 3, 2025. Accordingly, I believe it would be  
26 helpful to the Court's decisional process if I was able to attend the April 3, 2025 hearing and could  
27 participate in argument.

6. Prior to the filing of this motion, my colleague informed Plaintiffs' counsel of this request. Plaintiffs' counsel stated that they did not oppose this request.

I declare under penalty of perjury under the laws of the United States that the foregoing  
is true and correct. Executed on March 14, 2025 at Los Angeles, California.

/s/ Kasey J. Curtis

Kasey J. Curtis